

9490 Sunny Meadow Court
South Jordan, Utah 84009

July 11, 2017

Bureau of Land Management
Vernal Field Office
Attn: Stephanie Howard
170 South 500 East
Vernal, Utah 84078

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re: December Oil and Gas Lease Sale

Dear Ms. Howard:

Between 2003 – 2011 I was the State Coordinator for the National Park Service in Utah and, in that position, enjoyed working with numerous individuals in the Bureau of Land Management throughout the state. During that time I commented on or coordinated the comments on numerous oil and gas lease sales regarding the potential for impact to the 13 National Park System units in Utah. As well, I sometimes consulted on similar lease sale matters outside of Utah. I was particularly well qualified for this activity because, earlier in my career, I had served as the oil and gas manager for Big Cypress National Preserve, permitting and overseeing oil and gas exploration, development and reclamation operations in that park unit. A later position with the National Park Service Alaska Regional Office's Minerals Management Division provided additional experience in mining and oil and gas operations as well as serving over four years on the Management Team of the Exxon Valdez Oil Spill. All unusual experience for a National Park Service manager but enabling for me to be able work with the Bureau of Land Management on oil and gas in an understanding and informed manner.

I am writing to express my concerns regarding the proposed Vernal Field Office December Oil and Gas Lease Sale, particularly Lease Sale Parcels 069, 070 and 071. I request that those parcels be withdrawn from any oil and gas leasing due to their potential for impacts to Dinosaur National Monument.

Without doubt there would be impacts to the visitor experience at Dinosaur from oil and gas development of these and, potentially, other similar parcels in the vicinity of 069, 070 and 071. It is not just a matter of "visual" impacts of being able to observe oil and gas operations from a particular Key Observation Point. Oil and gas operations comprise a significant industrialization of a remote and rural landscape adjacent to a National Monument. Operators cannot mitigate for hundreds of large trucks, carrying tremendous amounts of drilling and operations-related equipment and hauling of product that impact narrow country roads and the unsuspecting visitor traffic they encounter. The odors of a wellfield are a substantial negative industrial impact--visitors should not be subjected to a foul odor experience when visiting the Quarry Wall or other attractions at Dinosaur. Fugitive dust is a nuisance and, palliative applications notwithstanding, there would still be dust from the operations. Emissions from wellfields in the Uintah Basin continues to be an air quality issue and another wellfield would be contributory to that problem affecting the region as well as the National Monument. A wellfield is noisy, its impacts to natural sound would be long-lasting and significant. The night sky of the National Monument would be adversely affected by wellfield development. Frankly, myself and many others

would regard encountering a wellfield at the entrance to one of Utah's premier visitor attractions an unacceptable impact.

I know that leasing does not constitute a discovery and a discovery does not constitute a wellfield. A wellfield is long way down an uncertain path in oil and gas development. However, the most effective time to consider the appropriateness of wellfield development is at the planning stage. After leasing and a consequent discovery, the opportunities to reconsider the impacts of wellfield development narrow greatly-- preventing such development becomes, for all practical purposes, an impossibility. The scope of this leasing activity and its accompanying environmental assessment limits impact consideration to an exploratory operation. And that is get to the problem, the objective of leasing and exploration is to develop oil and gas production, not to just drill and exploratory well.

Recently, many of us worked diligently to ensure oil and gas leasing and development was more certain, inclusive and fully-considered through the Master Leasing Plan process. That was an outcome of the disastrous and scandalous December, 2008 Oil and Gas Lease Sale where the Bureau of Land Management was, at the last minute, adding long-deferred parcels to that lease sale. That was a last ditch effort from those favoring development to offer parcels long-coveted by the industry that had been deferred absent adequate planning in the vicinity of Arches and Canyonlands National Parks and Dinosaur National Monument. After some scandalous moments, an investigation by the Deputy Secretary of the Interior and a full commission review which recommended reconsideration of the merits of leasing near Dinosaur National Monument, the Bureau of Land Management began a Master Leasing Process, intending at the time to develop such plans throughout the State of Utah. The process began with the Moab Master Leasing Plan and, by the accounts of which I am aware, resulted in a satisfactory outcome: Leasing certainty was provided to the industry and the parks had greater assurance of protection from adjacent lands development impacts.

Now with the coming of a new administration, the future for the Master Leasing Process is uncertain. Some would say, for the time being, the process is dead and one wonders about the future for even the Moab Master Leasing Plan. Ironical to me is that some of the same areas offered in this Lease Sale were among those at controversy in the disastrous December, 2008 Lease Sale. Clearly what is needed for the Vernal Field Office is a Master Leasing Plan rather than returning to the bad old days of lease nomination, objection and possible deferral and years of conflict over leasing near National Park System units.

I ask that the most careful consideration and deference be given to Utah's treasured landscapes and that the resources and visitor experience at Dinosaur National Monument be spared from the impacts of industrial development. For this reason, I recommend strongly that, at a minimum, lease parcels 069, 070 and 071 be deferred from the December 2017 lease sale, so that the Bureau of Land Management can take a closer look at whether oil and gas activity so close to Dinosaur National Monument is appropriate.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cordell J. Roy', with a long, sweeping horizontal line extending to the right.

Cordell J. Roy